

3. “AT&T” means AT&T Communications of the Southern States, LLC, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring

within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

10. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

11. “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.

12. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

13. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

14. Unless otherwise stated, information requests refer to the state of South Carolina.

15. Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

16. “CLEC” means a “Competitive Local Exchange Carrier,” and “local exchange provider” as defined in 47 U.S.C. § 153(26), which is not an “incumbent local exchange carrier” as defined in 47 U.S.C. § 251(h).

17. “ILEC” refers to Incumbent Local Exchange Carrier.

18. “CO” refers to Central Office.

19. “Coordinated cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch.

20. “Coordinated time-specific cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

21. “FCC” refers to the Federal Communications Commission.

22. “MDF” refers to Main Distribution Frame.

23. “UNE-L” refers to Unbundled Network Element-Loop.

24. “UNE-P” refers to Unbundled Network Element –Platform.

25. “1996 Telecom Act” refers to the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

a) the privilege asserted and its basis;

b) the nature of the information withheld;

c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are

intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and require supplemental responses should additional documents become available.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) Please produce all documents describing, outlining, memorializing or relating to the process described in BellSouth's response to Interrogatory No. 2. Documents should include BellSouth's internal documents and all documents available to CLECs.
- 2) Please produce all internal and external documentation, work papers, test related documents, test results, and analysis relied upon in BellSouth's response to Interrogatory No. 3.
- 3) With regard to BellSouth's response to Interrogatory No. 6, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.
- 4) With regard to BellSouth's response to Interrogatory No. 7, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.

- 5) Please produce the supporting work papers used in calculating or estimating the percentage described in BellSouth's response to Interrogatory No. 26.
- 6) Please provide a copy of all documents describing the BellSouth processes identified in BellSouth's response to Interrogatory No. 36.
- 7) Provide all methods and procedures documents, job aids and other materials provided to BellSouth personnel to use to process service requests for and to provision:
 - (a) Individual hot cuts of loop and number portability.
 - (b) Bulk migrations from UNE-P to UNE-L.

Such documents should include materials provided to BellSouth personnel in its provisioning and maintenance coordination center, Central Office, field installation personnel and order input center.

- 8) Provide a copy of all documents that set forth BellSouth's network centers force sizing model process and force models, and all associated instructions.
- 9) Provide a copy of all methods and procedures and other documents used to plan and manage the work schedules of CO and field technicians.
- 10) Provide copies of all documents which describe the process by which BellSouth processes multiple vendor orders, e.g. a CLEC using one wholesale provider for switching and another wholesale provider for the loop. Documents should include BellSouth's internal documents and all documents available to CLECs.

- 11) With regard to the documents referenced in Interrogatory No. 43, please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs, studies, or records.
- 12) Provide copies of all analysis and work papers used to support the information contained in your answer to Interrogatory No. 44.
- 13) With regard to response to Interrogatory No. 45, please provide all work papers, analysis, studies, reports, etc. that BellSouth relied upon in reaching the conclusions of that response.
- 14) With respect to performance measures that pertain to hot cut performance, including, but not limited to, a Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the required benchmarks.
- 15) Provide all documents that refer, relate to, or discuss the loop cutover volume capacity or through-put capability of the current BellSouth network in South Carolina and all documents that refer, relate to, analyze, or discuss how BellSouth believes such capacity/capability may be increased.
- 16) Referring to Interrogatory No. 50, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and the product, customer and geographic market served by such wholesale provider.

- 17) Referring to Interrogatory No. 50, produce all documents substantiating any assertion that a non-ILEC wholesale circuit switching provider is operationally ready to provide wholesale switching and that such provider and BellSouth have procedures in place to enable a carrier purchasing a BellSouth analog loop to provide service of equivalent quality (to what?) using another non-ILEC carrier's switch.
- 18) Referring to Interrogatory No. 50, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
- 19) Referring to Interrogatory No. 52, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self-provider and the product, customer and geographic market served by such self-provider.
- 20) Referring to Interrogatory No. 52, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
- 21) Referring to Interrogatory No. 71, if the answer to (c) is in the affirmative, produce all documents that refer, relate to, or discuss BellSouth's consideration of off-loading such lines to a different local switch.
- 22) Referring to Interrogatory No. 72, if the answer to (a) is in the affirmative, please produce a copy of BellSouth's switch engineering guidelines.

- 23) Referring to Interrogatory No. 73, please produce all documents describing BellSouth's FAR guidelines.
- 24) Provide all internal documents that refer, relate to, or discuss the profitability of BellSouth engaging in UNE-based competition to serve residential and/or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area.
- a) Identify each operational and economic factor BellSouth believes is appropriate to consider in making a determination whether to implement, continue, expand or curtail any out-of-region local market entry strategy.
 - b) Provide all documents that refer or relate to any operational or economic issue BellSouth has encountered in any effort BellSouth has made to implement or expand its out-of-region local market entry strategy.
- 25) Provide all documents that analyze out-of-region local market entry that have been reviewed, considered, or evaluated by BellSouth regarding entry to serve "mass-market" retail customers using self-provided switching since passage of the 1996 Telecom Act.
- 26) Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth whether to lease switching capacity from others as part of its out-of-region local market entry strategy to serve "mass-market" customers.
- 27) Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth of offering wholesale switching in any out-of-region local market.
- 28) Provide all documents analyzing or describing any external "market" for leased local switching capacity that BellSouth reviewed in evaluating its proposed pricing for de-listed local switching to serve voice grade loops. If no documents were reviewed, explain how BellSouth established its prices for de-listed local switching.

- 29) Provide any and all market surveys conducted or other documents and information reviewed by BellSouth that discuss or address:
- a) Pricing strategies of competitors offering local switching.
 - b) Product descriptions of competitors' offerings of local switching for mass-market customers.
 - c) Demand elasticity for local switching.
 - d) Demand projections related to the market for local switching.
 - e) Marketing strategies used by competitors offering local switching to serve mass-market customers.
- 30) Please provide a copy of all documents describing BellSouth processes identified in Interrogatory No. 103.
- 31) Referring to Interrogatory No. 108, please produce all documents referring or relating to any strategic behavior (pricing offers, advertising campaigns, packaged offerings, waiver of fees, term contract offerings, marketing strategies) BellSouth has evaluated or implemented in consideration of one or more CLEC's planned or actual entry into a local service market.

Submitted this 24th day of November, 2003.

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